

COBB COUNTY, GEORGIA

NEIGHBORHOOD STABILIZATION PROGRAM 3

PREPARED FOR SUBMISSION TO THE

U.S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT

Prepared by:

W. Frank Newton, Inc.

for the

Cobb County
Board of Commissioners

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NSP3 Grantee Information

NSP3 Program Administrator Contact Information	
Name (Last, First)	Autorina, Nick
Email Address	nautorina@cobbcountycdbg.com
Phone Number	770-528-4600
Mailing Address	127 Church Street, Marietta, GA 30060

I. Areas of Greatest Need

Map Submission

The map generated at the HUD NSP3 Mapping Tool for Preparing Action Plan website is included as an attachment. [See Attachment I]

Data Sources Used to Determine Areas of Greatest Need

Describe the data sources used to determine the areas of greatest need.

Response:

Cobb County will utilize the HUD Foreclosure Need information on the HUD website to obtain estimates of foreclosure need and a foreclosure needs scores at the Census tract level. The scores range from 1 – 20, with a score of 20 indicating areas with the greatest need. Cobb County will also utilize the HUD NSP3 Mapping Tool for Preparing Action Plan to prepare data for targeted areas and to create detailed maps of the target neighborhoods.

Determination of Areas of Greatest Need and Applicable Tiers

Describe how the areas of greatest need were established and whether a tiered approach is being utilized to determine the distribution of funding.

Response:

Cobb County will utilize a tiered approach, as described below for identifying the “Areas of Greatest Need” throughout the county.

A) Neighborhoods that score 17 or higher on the HUD Foreclosure Need website will be identified by the County as areas of greatest need. Cobb County has complied the high risk score Census tracts and block groups for the County to assist in targeting Cobb County’s NSP grant funds. [See Appendix: NSP3 Planning Market Analysis – NSP3 Impact Score by Low Mod Income Summary Level]

B) The NSP3 mapping tool allows the County to calculate the number of housing units and compare the Neighborhood NSP3 Score with the State Minimum threshold NSP3 score. The neighborhoods identified must have an individual score of that the lesser of 17 or the twentieth percentile most needy score.

By using these two methods Cobb County will form the basis of its foreclosure acquisition, rehabilitation, and sales efforts. Based upon HUD’s risk score data and Cobb’s local data, the area of greatest need in Cobb County is Powder Springs, Austell and a portion of unincorporated Marietta referred to as “Horseshoe Bend Area.” [See Appendix: NSP3 Planning Market Analysis – Potential Target Areas]. Based on HUD data, each of these areas

has over 10 percent of housing units that are 90 or more days delinquent or in foreclosure and have an average Neighborhood NSP3 score of 18.2. Cobb County identified these areas from our past success with NSPI. Sixty percent of our NSPI properties (pending sales and sold) were in these areas.

In addition, these areas were chosen based on the proximity to Community Transit routes, interstate access, and employment opportunities.

2. Definitions and Descriptions

Definitions

Term	Definition
Blighted Structure	<p>The State of Georgia defines "Blighted Structure" in House Bill 1313, Section 3, Title 22 of the Official Code of Georgia Annotated as: 'Blighted property', 'blighted', or 'blight' means any urbanized or developed property which:</p> <p>(A) Presents two or more of the following conditions:</p> <ul style="list-style-type: none"> (i) Uninhabitable, unsafe, or abandoned structures; (ii) Inadequate provisions for ventilation, light, air, or sanitation; (iii) An imminent harm to life of other property caused by fire, flood, hurricane, tornado, earthquake, storm or other natural catastrophe respecting which the Governor has declared a state of emergency under state law or has certified the need for disaster assistance under federal law; provided, however, this division shall not apply to property unless the relevant public agency has given notice in writing to the property owner regarding specific harm caused by the property and the owner has failed to take reasonable measures to remedy the harm; (iv) A site identified by the federal Environmental Protection Agency as a Superfund site pursuant to 42 U.S.C. Section 9601, et seq., or environmental contamination to an extent that requires remedial investigation or a feasibility study; (v) Repeated illegal activity on the individual property of which the property owner knew or should have known; or (vi) The maintenance of the property is below state, county, or municipal codes for at least one year after notice of the code violation; and <p>(B) is conducive to ill health, transmission of disease, infant mortality, or crime in the immediate proximity of the property.</p>

Affordable Rents	Cobb County will utilize the generally accepted definition of affordability, which states that a household to pay no more than 30 percent of its annual income on housing. Cobb County does not intend to utilize NSP3 funds for affordable rental housing.
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Descriptions

Term	Definition
Long-Term Affordability	Cobb County has determined that the designated time period for Long-Term Affordability is 15-years for Single-Family residential units. There is no interest and no monthly payment required on this note. If a NSP recipient lives in the property for 15 years, no repayment is necessary. If a NSP recipient sells the house prior to living in it for 15 years, 100% of NSP financial assistance will be repaid to Cobb County. There is no penalty for selling a house prior to living in it for 15 years other than the required repayment.
Housing Rehabilitation Standards	Cobb County has CDBG Housing Rehabilitation Program with detailed standards and specifications. Cobb County intends to adopt its current CDBG Housing Rehabilitation standards for the Cobb County NSP Program. These standards are in accordance with the International Residential Code (2006) as adopted by the State of Georgia.
Vicinity Hiring	Walton NSP, LLC, working as the asset management company on behalf of Cobb County NSP3, will make all possible efforts to adhere to the guidelines and requirements regarding the use of local, qualified contractors and vendors who are from the vicinity areas of the NSP3 funded projects. In cooperation with the intent of this requirement, Walton NSP will post advertisements in the local newspaper that serves these target areas (Powder Springs 1, Powder Springs 2, Austell and small portion of unincorporated Marietta) and make all efforts possible to encourage local vendors and contractors from these areas to bid on work. In the event multiple bids are received from qualified vendors, all things being equal, preferential treatment will be given to the vendor whose business resides in these target areas.

3. Low-Income Set-Aside Amount

Enter the low-income set-aside percentage in the first field. The field for total funds set aside will populate based on the percentage entered in the first field and the total NSP3 grant.

Identify the estimated amount of funds appropriated or otherwise made available under the NSP3 to be used to provide housing for individuals or families whose incomes do not exceed 50 percent of area median income.

Response:

Single Family:

Total low-income set-aside **percentage** (must be no less than 25 percent): **25%**

Total funds set aside for low-income individuals = **\$603,946** or $(\$2,415,784 \times 25\%)$

4. Meeting Low-Income Target

Provide a summary that describes the manner in which the low-income targeting goals will be met.

Response:

Single Family Acquisition, Rehab and Sale to NSP Recipient

Cobb County will allocate \$603,946 or 25% of its NSP3 grant amount for households whose incomes do not exceed 50% of the AMI. Cobb County will acquire vacant, foreclosed single family residential property, rehabilitate it to "move in ready" condition and sell it to a NSP recipient at our cost. We will also provide financial assistance in order to help a LHI applicant buy the NSP property. We will implement two financial mechanisms described below to provide housing for individuals or families whose incomes do not exceed 50 percent of the Area Median Income (AMI).

1. **"Soft Seconds"** Cobb County will utilize NSP program funds to reduce the Sales Price to an amount affordable to a household whose income does not exceed 50% of AMI. For example, if an NSP home has a sales price of \$100,000 and the homebuyer can only qualify for a loan of \$85,000, Cobb will give strong consideration to making a "Soft Second" loan for the \$15,000 difference. This mechanism can help many households at or below 50% of AMI to qualify for mortgages.
2. **Down-payment Assistance (DPA)** Cobb County will utilize NSP program funds in addition to funds provided by the HOME Investment Partnership Act to offer down-payment assistance to persons whose income is less than or equal to 50% of the Area Median Income.

These two financial mechanisms comprise the methods Cobb County will use to purchase and redevelop abandoned or foreclosed homes to create affordable housing for persons whose incomes do not exceed 50% of AMI.

For both "Soft Seconds" and DPA, Cobb County has determined that the designated time

period for Long-Term Affordability is 15-years for Single-Family residential units. There is no interest and no monthly payment required on this note. If a NSP recipient lives in the property for 15 years, no repayment for either financial mechanism is necessary. If a NSP recipient sells the house prior to living in it for 15 years, 100% of down payment assistance will be repaid to Cobb County. There is no penalty for selling a house prior to living in it for 15 years other than the required repayment.

5. Acquisition and Relocation

Demolition or Conversion of LMI Units

Does the grantee intend to demolish or convert any low- and moderate-income dwelling units (i.e., $\leq 80\%$ of area median income)?	No
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If yes, fill in the table below.

Question	Number of Units
The number of low- and moderate-income dwelling units—i.e., $\leq 80\%$ of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities.	N/A
The number of NSP affordable housing units made available to low-, moderate-, and middle-income households—i.e., $\leq 120\%$ of area median income—reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion).	N/A
The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income.	N/A

6. Public Comment

Citizen Participation Plan

Briefly describe how the grantee followed its citizen participation plan regarding this proposed substantial amendment or abbreviated plan.

Response:

Cobb County, in accordance with NSP public comment requirements, utilized the following public information avenues:

- Newspaper advertisement was published in the Marietta Daily Journal on Friday, January 21, 2011;
- Television advertisement was aired on TV23 [the local open access channel] on Tuesday, February 1, 2011;
- Cobb County CDBG Program Office website updated and live on Tuesday, February 1, 2011 and will remain open throughout the program;
- Conducted local public hearing on Wednesday, February 2, 2011 at the Cobb County Board of Commissioners Room in Marietta, Georgia.

The public hearing took place on Wednesday, February 2, 2011 [day 11] of the required 15 day public comment period, which began Friday, January 21, 2011 and concluded Monday, February 7, 2011.

Summary of Public Comments Received.
There were no comments at the public hearing.

7. NSP Information by Activity

Enter each activity name and fill in the corresponding information. If you have fewer than seven activities, please delete any extra activity fields. (For example, if you have three activities, you should delete the tables labeled "Activity Number 4," "Activity Number 5," "Activity Number 6," and "Activity Number 7." If you are unsure how to delete a table, see the instructions [above](#).

The field labeled "Total Budget for Activity" will populate based on the figures entered in the fields above it. Consult the [NSP3 Program Design Guidebook](#) for guidance on completing the "Performance Measures" component of the activity tables below.

Activity Number 1		
Activity Name	Cobb County NSP Rehabilitation Program for Single Family Homes	
Use	Select all that apply:	
	<input type="checkbox"/>	Eligible Use A: Financing Mechanisms
	<input type="checkbox"/>	Eligible Use B: Acquisition and Rehabilitation
	<input type="checkbox"/>	Eligible Use C: Land Banking
	<input type="checkbox"/>	Eligible Use D: Demolition
	<input type="checkbox"/>	Eligible Use E: Redevelopment
CDBG Activity or Activities	General program administration 24 CFR 570.206	
National Objective	N/A	
Activity Description	Cobb County will utilize 10% of the NSP3 grant for general administration and planning activities to administer the program.	
Location Description	N/A	
Budget	Source of Funding	Dollar Amount
	NSP3	\$ 241,579
Total Budget for Activity		\$ 241,579
Performance Measures	N/A	
Projected Start Date	May 1, 2011 (Tentative)	
Projected End Date	May 1, 2014	
Responsible Organization	Name	Cobb County NSP Program Office
	Location	127 Church Street, Suite 200 Marietta, GA 30060
	Administrator Contact Info	Nick Autorina nautorina@cobbcountycdbg.com (770) 528-4600

Activity Number 2		
Activity Name	Cobb County Financing Mechanism	
Uses	Select all that apply:	
	<input checked="" type="checkbox"/>	Eligible Use A: Financing Mechanisms
	<input type="checkbox"/>	Eligible Use B: Acquisition and Rehabilitation
	<input type="checkbox"/>	Eligible Use C: Land Banking
	<input type="checkbox"/>	Eligible Use D: Demolition
	<input type="checkbox"/>	Eligible Use E: Redevelopment
CDBG Activity or Activities	1. Eligible activities to the extent that financing mechanisms are utilized 2. An activity delivery cost for an eligible activity as defined in 24 CFR 570.201(n) 3. Direct home-ownership assistance	
National Objective	100% Low, moderate, middle-income persons	
Activity Description	Cobb County's NSP Financing Mechanism Program will be structured to meet all NSP statutory and regulatory issues. The financial mechanism activities for the County's Neighborhood Stabilization Program will serve the County's targeted Priority Areas which comport with HUD's Foreclosure and Abandonment Risk Scores and Cobb County's locally developed site specific home foreclosure lists. We will acquire approximately 17 single family residential properties and sell these properties to eligible NSP recipients whose income does not exceed 120% AMI. The NSP recipient will receive down payment assistance and soft seconds in order to assist them to purchase the NSP inventory home.	
Location Description	Cobb County will utilize its NSP 3 grant funds to assist low/moderate income persons in its areas of greatest need. These specific neighborhoods include Powder Springs, Marietta and Austell.	
Budget	Source of Funding	Dollar Amount
	NSP3	\$ 195,000
	HOME	\$ 75,000
Total Budget for Activity		\$ 270,000
Performance Measures	Total number of units provided with financing mechanism: <u>17</u> 1) 50% or under AMI [5 Units or \$125,000] 2) 51 – 80% AMI [5 Units or \$75,000] 3) 81-120% AMI [7 units or \$70,000]	
Projected Start Date	May 1, 2011 (Estimate)	
Projected End Date	May 1, 2014	
Responsible Organization	Name	Cobb County NSP Program Office
	Location	127 Church Street Suite 270 Marietta, GA 30060
	Administrator Contact Info	770-528-4600 or

Activity Number 3

Activity Name	Cobb County Single Family Acquisition	
Use	Select all that apply:	
	<input type="checkbox"/>	Eligible Use A: Financing Mechanisms
	<input type="checkbox"/>	Eligible Use B: Acquisition and Rehabilitation
	X	
	<input type="checkbox"/>	Eligible Use C: Land Banking
	<input type="checkbox"/>	Eligible Use D: Demolition
<input type="checkbox"/>	Eligible Use E: Redevelopment	
CDBG Activity or Activities	1. An activity delivery cost for an eligible activity as defined in 24 CFR 570.201(a) 2. Direct home-ownership assistance	
National Objective	100% Low, moderate, and middle income persons	
Activity Description	Cobb County's NSP Single Family Acquisition Program will be structured to meet all NSP statutory and regulatory issues. We will acquire approximately 17 single family residential properties at a minimum of an average of 10% discount in Powder Springs, Marietta and Austell and sell these properties to NSP eligible recipients whose income does not exceed 120% AMI.	
Location Description	Cobb County will utilize its NSP grant funds to assist low/moderate income persons in its areas of greatest need. These specific neighborhoods include Powder Springs, Marietta and Austell.	
Budget	Source of Funding	Dollar Amount
	NSP3	\$ 1,479,205
Total Budget for Activity	\$ 1,479,205	
Performance Measures	Total number of houses acquired: <u>17</u>	
	1) 50% or under AMI [5 Units or \$280,000]	
	2) 51 – 80% AMI [5 Units or \$450,000]	
	3) 81-120% AMI [7 units or \$749,205]	
Projected Start Date	May 1, 2011 (Tentative)	
Projected End Date	May 1, 2014	
Responsible Organization	Name	Cobb County NSP Program Office
	Location	127 Church Street, Ste 200 Marietta, GA 30060
	Administrator Contact Info	Nick Autorina nautorina@cobbcountycdbg.com (770) 528-4600

Activity Number 4

Activity Name	Cobb County NSP Rehabilitation Program for Single Family Homes	
Use	Select all that apply:	
	<input type="checkbox"/>	Eligible Use A: Financing Mechanisms
	<input checked="" type="checkbox"/>	Eligible Use B: Acquisition and Rehabilitation
	<input type="checkbox"/>	Eligible Use C: Land Banking
	<input type="checkbox"/>	Eligible Use D: Demolition
	<input type="checkbox"/>	Eligible Use E: Redevelopment
CDBG Activity or Activities	1)24 CFR 570.202 eligible rehabilitation and preservation activities for home and other residential properties.	
National Objective	100 % Low, moderate, and middle income	
Activity Description	Cobb County's NSP Rehabilitation Program will be structured to meet all NSP statutory and regulatory issues. 100% of NSP3 funds will address the needs and will benefit income qualified households whose income does not exceed 120% AMI. 25% of all NSP3 funds will serve households whose income does not exceed 50% of AMI.	
Location Description	Cobb County will utilize its NSP grant funds to assist low/moderate income persons in its areas of greatest need. These specific neighborhoods include Powder Springs, Marietta and Austell.	
Budget	Source of Funding	Dollar Amount
	NSP3	\$ 500,000
Total Budget for Activity	\$ 500,000	
Performance Measures	Total number of houses rehabilitated: <u>17</u>	
	1) 50% or under AMI [5 Units or \$200,000]	
	2) 51 – 80% AMI [5 Units or \$125,000]	
	3) 81-120% AMI [7 units or \$175,000]	
Projected Start Date	May 1, 2011 (Tentative)	
Projected End Date	May 1, 2014	

Responsible Organization	Name	Cobb County NSP Program Office
	Location	127 Church Street, Suite 200 Marietta, GA 30060
	Administrator Contact Info	Nick Autorina nautorina@cobbcountycdbg.com (770) 528-4600

Certifications

Certifications for State and Entitlement Communities

- (1) **Affirmatively further fair housing.** The jurisdiction certifies that it will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.
- (2) **Anti-displacement and relocation plan.** The applicant certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan.
- (3) **Anti-lobbying.** The jurisdiction must submit a certification with regard to compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.
- (4) **Authority of jurisdiction.** The jurisdiction certifies that the consolidated plan or abbreviated plan, as applicable, is authorized under state and local law (as applicable) and that the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and other program requirements.
- (5) **Consistency with plan.** The jurisdiction certifies that the housing activities to be undertaken with NSP funds are consistent with its consolidated plan or abbreviated plan, as applicable.
- (6) **Acquisition and relocation.** The jurisdiction certifies that it will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601), and implementing regulations at 49 CFR part 24, except as those provisions are modified by the notice for the NSP program published by HUD.
- (7) **Section 3.** The jurisdiction certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
- (8) **Citizen participation.** The jurisdiction certifies that it is in full compliance and following a detailed citizen participation plan that satisfies the requirements of Sections 24 CFR 91.105 or 91.115, as modified by NSP requirements.
- (9) **Following a plan.** The jurisdiction certifies it is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD. [Only States and entitlement jurisdictions use this certification.]
- (10) **Use of funds.** The jurisdiction certifies that it will comply with the Dodd-Frank Wall Street Reform and Consumer Protection Act and Title XII of Division A of the American Recovery and Reinvestment Act of 2009 by spending 50 percent of its grant funds within 2 years, and spending 100 percent within 3 years, of receipt of the grant.
- (11) **The jurisdiction certifies:**
 - a. that all of the NSP funds made available to it will be used with respect to individuals and families whose incomes do not exceed 120 percent of area median income; and
 - b. The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee

charged or assessment made as a condition of obtaining access to such public improvements. However, if NSP funds are used to pay the proportion of a fee or assessment attributable to the capital costs of public improvements (assisted in part with NSP funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. In addition, with respect to properties owned and occupied by moderate-income (but not low-income) families, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than NSP funds if the jurisdiction certifies that it lacks NSP or CDBG funds to cover the assessment.

(12) **Excessive force.** The jurisdiction certifies that it has adopted and is enforcing:

- a. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
- b. A policy of enforcing applicable state and local laws against physically barring entrance to, or exit from, a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

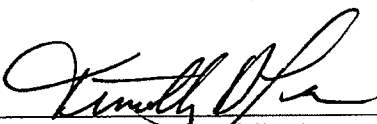
(13) **Compliance with anti-discrimination laws.** The jurisdiction certifies that the NSP grant will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.

(14) **Compliance with lead-based paint procedures.** The jurisdiction certifies that its activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K, and R of this title.

(15) **Compliance with laws.** The jurisdiction certifies that it will comply with applicable laws.

(16) **Vicinity hiring.** The jurisdiction certifies that it will, to the maximum extent feasible, provide for hiring of employees that reside in the vicinity of NSP3 funded projects or contract with small businesses that are owned and operated by persons residing in the vicinity of NSP3 projects.

(17) **Development of affordable rental housing.** The jurisdiction certifies that it will abide by the procedures described in its NSP3 Abbreviated Plan to create preferences for the development of affordable rental housing for properties assisted with NSP3 funds.



Signature/Authorized Official

Timothy D. Lee, Chairman
Cobb County Board of
Commissioners

Title



2/24/11
Date

APPROVED
PER MINUTES OF
COBB COUNTY
BOARD OF COMMISSIONERS

Certifications for Non-Entitlement Local Governments

- (1) **Affirmatively further fair housing.** The jurisdiction certifies that it will affirmatively further fair housing.
- (2) **Anti-displacement and relocation plan.** The applicant certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan.
- (3) **Anti-lobbying.** The jurisdiction must submit a certification with regard to compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.
- (4) **Authority of jurisdiction.** The jurisdiction certifies that the consolidated plan or abbreviated plan, as applicable, is authorized under state and local law (as applicable) and that the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and other program requirements.
- (5) **Consistency with plan.** The jurisdiction certifies that the housing activities to be undertaken with NSP funds are consistent with its consolidated plan or abbreviated plan, as applicable.
- (6) **Acquisition and relocation.** The jurisdiction certifies that it will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601), and implementing regulations at 49 CFR part 24, except as those provisions are modified by the notice for the NSP program published by HUD.
- (7) **Section 3.** The jurisdiction certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
- (8) **Citizen participation.** The jurisdiction certifies that it is in full compliance and following a detailed citizen participation plan that satisfies the requirements of Sections 24 CFR 91.105 or 91.115, as modified by NSP requirements.
- (9) **Use of funds.** The jurisdiction certifies that it will comply with the Dodd-Frank Wall Street Reform and Consumer Protection Act and Title XII of Division A of the American Recovery and Reinvestment Act of 2009 by spending 50 percent of its grant funds within 2 years, and spending 100 percent within 3 years, of receipt of the grant.
- (10) **The jurisdiction certifies:**
 - a. that all of the NSP funds made available to it will be used with respect to individuals and families whose incomes do not exceed 120 percent of area median income; and
 - b. The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if NSP funds are used to pay the proportion of a fee or assessment attributable to the capital costs of public improvements (assisted in

part with NSP funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. In addition, with respect to properties owned and occupied by moderate-income (but not low-income) families, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than NSP funds if the jurisdiction certifies that it lacks NSP or CDBG funds to cover the assessment.

(11) **Excessive force.** The jurisdiction certifies that it has adopted and is enforcing:

- a. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
- b. A policy of enforcing applicable state and local laws against physically barring entrance to, or exit from, a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

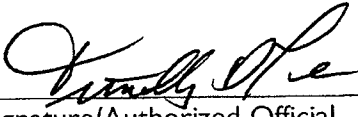
(12) **Compliance with anti-discrimination laws.** The jurisdiction certifies that the NSP grant will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.

(13) **Compliance with lead-based paint procedures.** The jurisdiction certifies that its activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K, and R of this title.

(14) **Compliance with laws.** The jurisdiction certifies that it will comply with applicable laws.

(15) **Vicinity hiring.** The jurisdiction certifies that it will, to the maximum extent feasible, provide for hiring of employees that reside in the vicinity of NSP3 funded projects or contract with small businesses that are owned and operated by persons residing in the vicinity of NSP3 projects.

(16) **Development of affordable rental housing.** The jurisdiction certifies that it will be abide by the procedures described in its NSP3 Abbreviated Plan to create preferences for the development of affordable rental housing for properties assisted with NSP3 funds.


Signature/Authorized Official
Timothy D. Lee, Chairman
Cobb County Board of
Commissioners

Title



Date 2/24/11

APPROVED
PER MINUTES OF
COBB COUNTY
BOARD OF COMMISSIONERS

2/22/11

Neighborhood ID: 9656127

NSP3 Planning Data

Grantee ID: 1306700C

Grantee State: GA

Grantee Name: COBB COUNTY

Grantee Address: 127 Church St, Ste 200 Marietta GA 30060

Grantee Email: deanna@buycobb.com

Neighborhood Name: Powder Springs 2

Date: 2011-02-16 00:00:00

NSP3 Score

The neighborhoods identified by the NSP3 grantee as being the areas of greatest need must have an individual or average combined index score for the grantee's identified target geography that is not less than the lesser of 17 or the twentieth percentile most needy score in an individual state. For example, if a state's twentieth percentile most needy census tract is 18, the requirement will be a minimum need of 17. If, however, a state's twentieth percentile most needy census tract is 15, the requirement will be a minimum need of 15. If more than one neighborhood is identified in the Action Plan, HUD will average the Neighborhood Scores, weighting the scores by the estimated number of housing units in each identified neighborhood.

Neighborhood NSP3 Score: 18.35

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 1814

Area Benefit Eligibility

Percent Persons Less than 120% AMI: 57.09

Percent Persons Less than 80% AMI: 28.91

Neighborhood Attributes (Estimates)

Vacancy Estimate

USPS data on addresses not receiving mail in the last 90 days or "NoStat" can be a useful measure of whether or not a target area has a serious vacancy problem. For urban neighborhoods, HUD has found that neighborhoods with a very high number vacant addresses relative to the total addresses in an area to be a very good indicator of a current for potentially serious blight problem.

The USPS "NoStat" indicator can mean different things. In rural areas, it is an indicator of vacancy. However, it can also be an address that has been issued but not ever used, it can indicate units under development, and it can be a very distressed property (most of the still flood damaged properties in New Orleans are NoStat). When using this variable, users need to understand the target area identified.

In addition, the housing unit counts HUD gets from the US Census indicated above are usually close to the residential address counts from the USPS below. However, if the Census and USPS counts are substantially different for your identified target area, users are advised to use the information below with caution. For example if there are many NoStats in an area for units never built, the USPS residential address count may be larger than the Census number; if the area is a rural area largely served by PO boxes it may have fewer addresses than housing units.

USPS Residential Addresses in Neighborhood: 2291

Residential Addresses Vacant 90 or more days (USPS, March 2010): 66

Residential Addresses NoStat (USPS, March 2010): 108

Foreclosure Estimates

HUD has developed a model for predicting where foreclosures are likely. That model estimates serious delinquency rates using data on the leading causes of foreclosures - subprime loans (HMDA Census Tract data on high cost and highly leveraged loans), increasing unemployment (BLS data on unemployment rate change), and fall in home values (FHFA data on house price change). The predicted serious delinquency rate is then used to apportion the state total counts of foreclosure starts (from the Mortgage Bankers Association) and REOs (from RealtyTrac) to individual block groups.

Total Housing Units to receive a mortgage between 2004 and 2007: 1194

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 28.05

Percent of Housing Units 90 or more days delinquent or in foreclosure: 10.89

Number of Foreclosure Starts in past year: 115

Number of Housing Units Real Estate Owned July 2009 to June 2010: 60

HUD is encouraging grantees to have small enough target areas for NSP 3 such that their dollars will have a visible impact on the neighborhood. Nationwide there have been over 1.9 million foreclosure completions in the past two years. NSP 1, 2, and 3 combined are estimated to only be able to address 100,000 to 120,000 foreclosures. To stabilize a neighborhood requires focused investment.

Estimated number of properties needed to make an impact in identified target area (20% of REO in past year): 24

Supporting Data

Metropolitan Area (or non-metropolitan area balance) percent fall in home value since peak value (Federal Housing Finance Agency Home Price Index through June 2010): -11.6

Place (if place over 20,000) or county unemployment rate June 2005¹: 4.6

Place (if place over 20,000) or county unemployment rate June 2010¹: 9.3

¹Bureau of Labor Statistics Local Area Unemployment Statistics

Market Analysis:

HUD is providing the data above as a tool for both neighborhood targeting and to help inform the strategy development. Some things to consider:

1. Persistent Unemployment. Is this an area with persistently high unemployment? Serious consideration should be given to a rental strategy rather than a homeownership strategy.
2. Home Value Change and Vacancy. Is this an area where foreclosures are largely due to a combination of falling home values, a recent spike in unemployment, and a relatively low vacancy rate? A down payment assistance program may be an effective strategy.
3. Persistently High Vacancy. Are there a high number of substandard vacant addresses in the target area of a community with persistently high unemployment? A demolition/land bank strategy with selected acquisition rehab for rental or lease-purchase might be considered.
4. Historically low vacancy that is now rising. A targeted strategy of acquisition for homeownership and rental to retain or regain neighborhood stability might be considered.
5. Historically high cost rental market. Does this market historically have very high rents with low vacancies? A strategy of acquiring properties and developing them as long-term affordable rental might be considered.

Latitude and Longitude of corner points

-84.703817 33.881318 -84.658842 33.876615 -84.663477 33.860153 -84.710855 33.874478

Blocks Comprising Target Neighborhood

130670315012024, 130670315012032, 130670315011017, 130670315012034, 130670315012033,
130670315041007, 130670315041014, 130670315041999, 130670315043000, 130670315043003,
130670315043005, 130670315043007, 130670315043020, 130670315043011, 130670315043010,
130670315043009, 130670315043008, 130670315043027, 130670315043024, 130670315043023,
130670315043022, 130670315043021, 130670315043006, 130670315043004, 130670315043002,
130670315043001, 130670315051000, 130670315051007, 130670315051011, 130670315051013,
130670315051015, 130670315051023, 130670315051021, 130670315051018, 130670315051014,
130670315051010, 130670315051001, 130670315011019, 130670315011018, 130670315011014,
130670315041008, 130670315043014, 130670315043026, 130670315043025, 130670315043015,
130670315051002, 130670315051003, 130670315051004, 130670315051025, 130670315051024,
130670315051008, 130670315051006, 130670315051005,

Neighborhood ID: 3125305

NSP3 Planning Data

Grantee ID: 1306700C

Grantee State: GA

Grantee Name: COBB COUNTY

Grantee Address: 127 Church St, Ste 200 Marietta GA 30060

Grantee Email: deanna@buycobb.com

Neighborhood Name: Horseshoe Bend Area

Date: 2011-02-22 00:00:00

NSP3 Score

The neighborhoods identified by the NSP3 grantee as being the areas of greatest need must have an individual or average combined index score for the grantee's identified target geography that is not less than the lesser of 17 or the twentieth percentile most needy score in an individual state. For example, if a state's twentieth percentile most needy census tract is 18, the requirement will be a minimum need of 17. If, however, a state's twentieth percentile most needy census tract is 15, the requirement will be a minimum need of 15. If more than one neighborhood is identified in the Action Plan, HUD will average the Neighborhood Scores, weighting the scores by the estimated number of housing units in each identified neighborhood.

Neighborhood NSP3 Score: 19

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 1528

Area Benefit Eligibility

Percent Persons Less than 120% AMI: 57.62

Percent Persons Less than 80% AMI: 25.45

Neighborhood Attributes (Estimates)

Vacancy Estimate

USPS data on addresses not receiving mail in the last 90 days or "NoStat" can be a useful measure of whether or not a target area has a serious vacancy problem. For urban neighborhoods, HUD has found that neighborhoods with a very high number vacant addresses relative to the total addresses in an area to be a very good indicator of a current for potentially serious blight problem.

The USPS "NoStat" indicator can mean different things. In rural areas, it is an indicator of vacancy. However, it can also be an address that has been issued but not ever used, it can indicate units under development, and it can be a very distressed property (most of the still flood damaged properties in New Orleans are NoStat). When using this variable, users need to understand the target area identified.

In addition, the housing unit counts HUD gets from the US Census indicated above are usually close to the residential address counts from the USPS below. However, if the Census and USPS counts are substantially different for your identified target area, users are advised to use the information below with caution. For example if there are many NoStats in an area for units never built, the USPS residential address count may be larger than the Census number; if the area is a rural area largely served by PO boxes it may have fewer addresses than housing units.

USPS Residential Addresses in Neighborhood: 1867

Residential Addresses Vacant 90 or more days (USPS, March 2010): 77

Residential Addresses NoStat (USPS, March 2010): 120

Foreclosure Estimates

HUD has developed a model for predicting where foreclosures are likely. That model estimates serious delinquency rates using data on the leading causes of foreclosures - subprime loans (HMDA Census Tract data on high cost and highly leveraged loans), increasing unemployment (BLS data on unemployment rate change), and fall in home values (FHFA data on house price change). The predicted serious delinquency rate is then used to apportion the state total counts of foreclosure starts (from the Mortgage Bankers Association) and REOs (from RealtyTrac) to individual block groups.

Total Housing Units to receive a mortgage between 2004 and 2007: 872

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 32.3

Percent of Housing Units 90 or more days delinquent or in foreclosure: 12.1

Number of Foreclosure Starts in past year: 93

Number of Housing Units Real Estate Owned July 2009 to June 2010: 49

HUD is encouraging grantees to have small enough target areas for NSP 3 such that their dollars will have a visible impact on the neighborhood. Nationwide there have been over 1.9 million foreclosure completions in the past two years. NSP 1, 2, and 3 combined are estimated to only be able to address 100,000 to 120,000 foreclosures. To stabilize a neighborhood requires focused investment.

Estimated number of properties needed to make an impact in identified target area (20% of REO in past year): 18

Supporting Data

Metropolitan Area (or non-metropolitan area balance) percent fall in home value since peak value (Federal Housing Finance Agency Home Price Index through June 2010): -11.6

Place (if place over 20,000) or county unemployment rate June 2005*: 4.6

Place (if place over 20,000) or county unemployment rate June 2010*: 9.3

*Bureau of Labor Statistics Local Area Unemployment Statistics

Market Analysis:

HUD is providing the data above as a tool for both neighborhood targeting and to help inform the strategy development. Some things to consider:

1. Persistent Unemployment. Is this an area with persistently high unemployment? Serious consideration should be given to a rental strategy rather than a homeownership strategy.
2. Home Value Change and Vacancy. Is this an area where foreclosures are largely due to a combination of falling home values, a recent spike in unemployment, and a relatively low vacancy rate? A down payment assistance program may be an effective strategy.
3. Persistently High Vacancy. Are there a high number of substandard vacant addresses in the target area of a community with persistently high unemployment? A demolition/land bank strategy with selected acquisition rehab for rental or lease-purchase might be considered.
4. Historically low vacancy that is now rising. A targeted strategy of acquisition for homeownership and rental to retain or regain neighborhood stability might be considered.
5. Historically high cost rental market. Does this market historically have very high rents with low vacancies? A strategy of acquiring properties and developing them as long-term affordable rental might be considered.

Latitude and Longitude of corner points

-84.624939 33.899914 -84.638586 33.888658 -84.632492 33.867209 -84.626141 33.870344 -84.617643 33.885024

Blocks Comprising Target Neighborhood

130670315031003, 130670315033000, 130670315033001, 130670315033017, 130670315033016,
130670315033015, 130670315033014, 130670315033013, 130670315033012, 130670315033011,
130670315033010, 130670315033009, 130670315033008, 130670315033007, 130670315033006,
130670315033005, 130670315033003, 130670315033002,

Neighborhood ID: 4859497

NSP3 Planning Data

Grantee ID: 1306700C

Grantee State: GA

Grantee Name: COBB COUNTY

Grantee Address: 127 Church St, Ste 200 Marietta GA 30060

Grantee Email: deanna@buycobb.com

Neighborhood Name: Austell

Date: 2011-02-16 00:00:00

NSP3 Score

The neighborhoods identified by the NSP3 grantee as being the areas of greatest need must have an individual or average combined index score for the grantee's identified target geography that is not less than the lesser of 17 or the twentieth percentile most needy score in an individual state. For example, if a state's twentieth percentile most needy census tract is 18, the requirement will be a minimum need of 17. If, however, a state's twentieth percentile most needy census tract is 15, the requirement will be a minimum need of 15. If more than one neighborhood is identified in the Action Plan, HUD will average the Neighborhood Scores, weighting the scores by the estimated number of housing units in each identified neighborhood.

Neighborhood NSP3 Score: 17.96

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 3319

Area Benefit Eligibility

Percent Persons Less than 120% AMI: 81.18

Percent Persons Less than 80% AMI: 56.53

Neighborhood Attributes (Estimates)

Vacancy Estimate

USPS data on addresses not receiving mail in the last 90 days or "NoStat" can be a useful measure of whether or not a target area has a serious vacancy problem. For urban neighborhoods, HUD has found that neighborhoods with a very high number vacant addresses relative to the total addresses in an area to be a very good indicator of a current for potentially serious blight problem.

The USPS "NoStat" indicator can mean different things. In rural areas, it is an indicator of vacancy. However, it can also be an address that has been issued but not ever used, it can indicate units under development, and it can be a very distressed property (most of the still flood damaged properties in New Orleans are NoStat). When using this variable, users need to understand the target area identified.

In addition, the housing unit counts HUD gets from the US Census indicated above are usually close to the residential address counts from the USPS below. However, if the Census and USPS counts are substantially different for your identified target area, users are advised to use the information below with caution. For example if there are many NoStats in an area for units never built, the USPS residential address count may be larger than the Census number; if the area is a rural area largely served by PO boxes it may have fewer addresses than housing units.

USPS Residential Addresses in Neighborhood: 4368

Residential Addresses Vacant 90 or more days (USPS, March 2010): 298

Residential Addresses NoStat (USPS, March 2010): 387

Foreclosure Estimates

HUD has developed a model for predicting where foreclosures are likely. That model estimates serious delinquency rates using data on the leading causes of foreclosures - subprime loans (HMDA Census Tract data on high cost and highly leveraged loans), increasing unemployment (BLS data on unemployment rate change), and fall in home values (FHFA data on house price change). The predicted serious delinquency rate is then used to apportion the state total counts of foreclosure starts (from the Mortgage Bankers Association) and REOs (from RealtyTrac) to individual block groups.

Total Housing Units to receive a mortgage between 2004 and 2007: 1142

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 30.83

Percent of Housing Units 90 or more days delinquent or in foreclosure: 11.18

Number of Foreclosure Starts in past year: 110

Number of Housing Units Real Estate Owned July 2009 to June 2010: 59

HUD is encouraging grantees to have small enough target areas for NSP 3 such that their dollars will have a visible impact on the neighborhood. Nationwide there have been over 1.9 million foreclosure completions in the past two years. NSP 1, 2, and 3 combined are estimated to only be able to address 100,000 to 120,000 foreclosures. To stabilize a neighborhood requires focused investment.

Estimated number of properties needed to make an impact in identified target area (20% of REO in past year): 22

Supporting Data

Metropolitan Area (or non-metropolitan area balance) percent fall in home value since peak value (Federal Housing Finance Agency Home Price Index through June 2010): -11.6

Place (if place over 20,000) or county unemployment rate June 2005*: 4.6

Place (if place over 20,000) or county unemployment rate June 2010*: 9.3

*Bureau of Labor Statistics Local Area Unemployment Statistics

Market Analysis:

HUD is providing the data above as a tool for both neighborhood targeting and to help inform the strategy development. Some things to consider:

1. Persistent Unemployment. Is this an area with persistently high unemployment? Serious consideration should be given to a rental strategy rather than a homeownership strategy.
2. Home Value Change and Vacancy. Is this an area where foreclosures are largely due to a combination of falling home values, a recent spike in unemployment, and a relatively low vacancy rate? A down payment assistance program may be an effective strategy.
3. Persistently High Vacancy. Are there a high number of substandard vacant addresses in the target area of a community with persistently high unemployment? A demolition/land bank strategy with selected acquisition rehab for rental or lease-purchase might be considered.
4. Historically low vacancy that is now rising. A targeted strategy of acquisition for homeownership and rental to retain or regain neighborhood stability might be considered.
5. Historically high cost rental market. Does this market historically have very high rents with low vacancies? A strategy of acquiring properties and developing them as long-term affordable rental might be considered.

Latitude and Longitude of corner points

-84.546747 33.779433 -84.563570 33.789919 -84.602280 33.789491 -84.604597 33.782786 -84.586916
33.776080 -84.564428 33.774724

Blocks Comprising Target Neighborhood

130670313093001, 130670313093002, 130670313093004, 130670313093028, 130670313093029,
130670313093027, 130670313093025, 130670313093005, 130670313093003, 130670313101000,
130670313101004, 130670313101012, 130670313101011, 130670313101009, 130670313101008,
130670313101007, 130670313101005, 130670313101003, 130670313101001, 130670313101002,
130670313111000, 130670313111001, 130670313111002, 130670313111004, 130670313111006,
130670313111008, 130670313111007, 130670313111005, 130670313111003, 130670313112009,
130670313112010, 130670313112013, 130670313112015, 130670313112017, 130670313112019,
130670313112999, 130670313112025, 130670313112024, 130670313112021, 130670313112020,
130670313112018, 130670313112016, 130670313112014, 130670313112011,

Neighborhood ID: 3451599

NSP3 Planning Data

Grantee ID: 1306700C

Grantee State: GA

Grantee Name: COBB COUNTY

Grantee Address: 127 Church St, Ste 200 Marietta GA 30060

Grantee Email: deanna@buycobb.com

Neighborhood Name: Powder Springs

Date: 2011-02-16 00:00:00

NSP3 Score

The neighborhoods identified by the NSP3 grantee as being the areas of greatest need must have an individual or average combined index score for the grantee's identified target geography that is not less than the lesser of 17 or the twentieth percentile most needy score in an individual state. For example, if a state's twentieth percentile most needy census tract is 18, the requirement will be a minimum need of 17. If, however, a state's twentieth percentile most needy census tract is 15, the requirement will be a minimum need of 15. If more than one neighborhood is identified in the Action Plan, HUD will average the Neighborhood Scores, weighting the scores by the estimated number of housing units in each identified neighborhood.

Neighborhood NSP3 Score: 17.53

State Minimum Threshold NSP3 Score: 17

Total Housing Units in Neighborhood: 1147

Area Benefit Eligibility

Percent Persons Less than 120% AMI: 59.8

Percent Persons Less than 80% AMI: 30.98

Neighborhood Attributes (Estimates)

Vacancy Estimate

USPS data on addresses not receiving mail in the last 90 days or "NoStat" can be a useful measure of whether or not a target area has a serious vacancy problem. For urban neighborhoods, HUD has found that neighborhoods with a very high number vacant addresses relative to the total addresses in an area to be a very good indicator of a current for potentially serious blight problem.

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USPS Residential Addresses in Neighborhood: 1676

Residential Addresses Vacant 90 or more days (USPS, March 2010): 50

Residential Addresses NoStat (USPS, March 2010): 117

Foreclosure Estimates

HUD has developed a model for predicting where foreclosures are likely. That model estimates serious delinquency rates using data on the leading causes of foreclosures - subprime loans (HMDA Census Tract data on high cost and highly leveraged loans), increasing unemployment (BLS data on unemployment rate change), and fall in home values (FHFA data on house price change). The predicted serious delinquency rate is then used to apportion the state total counts of foreclosure starts (from the Mortgage Bankers Association) and REOs (from RealtyTrac) to individual block groups.

Total Housing Units to receive a mortgage between 2004 and 2007: 848

Percent of Housing Units with a high cost mortgage between 2004 and 2007: 26.02

Percent of Housing Units 90 or more days delinquent or in foreclosure: 10.18

Number of Foreclosure Starts in past year: 76

Number of Housing Units Real Estate Owned July 2009 to June 2010: 39

HUD is encouraging grantees to have small enough target areas for NSP 3 such that their dollars will have a visible impact on the neighborhood. Nationwide there have been over 1.9 million foreclosure completions in the past two years. NSP 1, 2, and 3 combined are estimated to only be able to address 100,000 to 120,000 foreclosures. To stabilize a neighborhood requires focused investment.

Estimated number of properties needed to make an impact in identified target area (20% of REO in past year): 15

Supporting Data

Metropolitan Area (or non-metropolitan area balance) percent fall in home value since peak value (Federal Housing Finance Agency Home Price Index through June 2010): -11.6

Place (if place over 20,000) or county unemployment rate June 2005¹: 4.6

Place (if place over 20,000) or county unemployment rate June 2010¹: 9.3

¹Bureau of Labor Statistics Local Area Unemployment Statistics

Market Analysis:

HUD is providing the data above as a tool for both neighborhood targeting and to help inform the strategy development. Some things to consider:

1. Persistent Unemployment. Is this an area with persistently high unemployment? Serious consideration should be given to a rental strategy rather than a homeownership strategy.
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5. Historically high cost rental market. Does this market historically have very high rents with low vacancies? A strategy of acquiring properties and developing them as long-term affordable rental might be considered.

Latitude and Longitude of corner points

-84.691887 33.854807 -84.707851 33.834847 -84.707251 33.830640 -84.698839 33.830141 -84.698238
33.826434 -84.694977 33.822227 -84.685621 33.821157 -84.685535 33.827360 -84.676952 33.824294
-84.681244 33.845683

Blocks Comprising Target Neighborhood

130670314076007, 130670315017016, 130670315015000, 130670315017003, 130670315017004,
130670315017009, 130670315053015, 130670315053011, 130670315015006, 130670315015001,
130670315015005, 130670315015004, 130670315015003, 130670315015002, 130670315015007,
130670315016000, 130670315016002, 130670315016005, 130670315016004, 130670315016003,
130670315016006, 130670315016010, 130670315016007, 130670315017001, 130670315017005,
130670315017008, 130670315017007, 130670315017006, 130670315017002, 130670315017010,
130670315017017, 130670315017015, 130670315017014, 130670315017013, 130670315017012,
130670315017011, 130670315053013, 130670315053014, 130670315053018, 130670315053017,